UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA Alexandria Division

| IN RE: | Clarence A. Lee, Jr. |) |
|--------|----------------------|-------------------------|
| | Rose M. Lee |) |
| | |) CHAPTER 13 |
| | Debtors. |) CASE NO. 10-10053-SSM |
| | |) |

MOTION FOR APPROVAL OF CHAPTER 13 DEBTOR'S ATTORNEY'S FEES

Comes now the Debtors' counsel and moves for approval of Debtors' attorney's fees and costs and represents as follows:

- 1. That Counsel has expended the time and expenses set forth in the attached billing in the prosecution of Debtors' Chapter 13 case and associated adversary proceeding.
- 2. That such fees were reasonably necessary in carrying out Debtors' Plan and were of benefit to the Debtors and the estate. In addition to normal Chapter 13 issues there was an objection to the plan by the second trust lender and by a vehicle lender and a claim objection by Debtors to a Wells Fargo secured claim as well as the Adversary Proceeding which was initially defended and went into discovery proceedings as a contested proceeding before settling in Debtors' favor and recently a relief from stay motion.
- 3. That the hourly rate and fees charged are in keeping with the fees normally charged for comparable work both for bankruptcy and non-bankruptcy cases in this area.
 - 4. That the fees charged contain no charges of a type normally prohibited in this jurisdiction.

Ronald B. Cox, Va. Bar #16981 Counsel for Debtors P.O. Box 468 308 Poplar Alley, Suite C Occoquan, Virginia 22125 703-490-3000 Case 10-10053-SSM Doc 41 Filed 03/17/11 Entered 03/17/11 17:13:11 Desc Main Document Page 2 of 4

- 5. That Debtors have paid a retainer of \$1,700.00 in this matter and the Trustee has paid \$500.00. Counsel seeks approval of \$6,181.16 in total fees of which \$3,981.16 are to be paid henceforth in the Plan.
- 6. That Debtors' Plan provides a reserve for payments of \$2,800.00 of Debtors' attorney's fees and it is believed that payment of the amount sought will still result in payment to general unsecured creditors exceeding the percentage projected in the confirmed plan.

Wherefore counsel moves for approval of such fees and charges and for payment of such forthwith upon available funds through the Chapter 13 Trustee.

RONALD B. COX, ESQUIRE Counsel for Debtors

/s/ Ronald B. Cox

RONALD B. COX, ESQUIRE

Counsel for Debtors

P.O. Box 468

308-C Poplar Alley

Occoquan, Virginia 22125

(703) 490-3000

Virginia State Bar No.: 16981

CERTIFICATE OF SERVICE

I hereby certify that I have this 17th day of March, 2011, mailed via U.S. first class mail, a true copy of the foregoing Motion to the Debtors as follows:

Clarence & Rose Lee 1651 George's Knoll Court Woodbridge, VA 22192

And to all creditors on the attached mailing matrix, and to all other parties entitled to email service through the courts procedure.

Ronald B. Cox, Esquire Counsel for Debtors

Ronald B. Cox

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Alexandria Tue Mar 8 12:27:40 EST 2011

United States Bankruptcy Court 200 South Washington Street Alexandria, VA 22314-5405

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c/o Huston & Angus 5529 Lee Hwy Arlington, VA 22207-1613 Occoquan Landing Homeowners Association c/o Rees Broome, PC 8133 Leesburg Pike, 9th Floor Vienna, VA 22182-2706

Alliance One Receivables Momt. 4850 Street Road, Suite

Feasterville Trevose, PA 19053-6600

Aurora Loan Services P.O. Box 1706

Scottsbluff, NE 69363-1706

BAC Home Loans Servicing 450 American Street

Simi Valley, CA 93065-6285

(p) CONGRESSIONAL FEDERAL CREDIT UNION PO BOX 23267

WASHINGTON DC 20026-3267

GE Consumer Finance For GE Money Bank dba GECAF/GEMB PO Box 960061 Orlando FL 32896-0661

GE Money Bank Attn.: Bankruptcy Dept. P.O. Box 103106 Roswell, GA 30076-9106

Insight Health Corp P.O. Box 404166 Atlanta, GA 30384-4166 Nectar Projects, Inc. 104 N. Bailey Lane Suite 100

Purcellville, VA 20132-3086

Occoquan Landing HOA c/o Rees Broome, PC 8133 Leesburg Pike, 9th Flr. Vienna, VA 22182-2706

(p) WACHOVIA BANK NA PO BOX 13765 ROANOKE VA 24037-3765 Wells Fargo Bank NA 4137 121st Street Urbandale IA 50323-2310

Wells Fargo Financial Bank 800 Walnut Street Documentation Dept MACF4030-04 Des Moines, IA 50309-3605

Wells Fargo Financial Cards P.O. Box 98791 Las Vegas, NV 89193-8791

Wells Fargo Financial National P.O. Box 10475 Des Moines, IA 50306-0475

Wells Fargo Financial National Bank 4137 121st Street Urbandale, IA 50323-2310

Wright Patman Congressional FCU P.O. Box 23267 Washington, DC 20026-3267

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Rose M. Lee 1651 George's Knoll Court Woodbridge, VA 22192-7703

Thomas P. Gorman 300 N. Washington St. Ste. 400 Alexandria, VA 22314-2550

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (q) (4).

Congressional FCU 10461 White Granite Drive Oakton, VA 22124-0000

Wachovia Bank Central Bankruptcy Department VA 7359, P.O. Box 13765 Roanoke, VA 24037-0000

(d) Wachovia Bank N.A. C/O Bankruptcy R4057-01P PO Box 13765 Roanoke, VA 24037-3765

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

24

(u) Aurora Loan Services, LLC

End of Label Matrix

Mailable recipients 23

Bypassed recipients 1

Total